
From: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]
Sent: 6/3/2014 11:42:30 AM
To: Graves, Randy [Randy.Graves@mgpingredients.com]
CC: Mike Wiczorek [mwiczorek@environcorp.com]; Templin, Mike [Mike.Templin@mgpingredients.com]; Hussain, Munim [Munim.Hussain@mgpingredients.com]; Rindom, Dave [Dave.Rindom@mgpingredients.com]
Subject: RE: Comments to Draft Permit 029-32119-00005

Hello Mr. Graves,

I wanted to let you know the only comments we received on MGPI's renewal were the ones you submitted on May 20th. The permit has been proposed to the EPA for a 15 day review time. I will let you know if we receive any comments from the EPA/ when the permit has been approved for issuance.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031
Fax: (317) 232-6749
kwilloug@idem.IN.gov

From: Graves, Randy [mailto:Randy.Graves@mgpingredients.com]
Sent: Tuesday, May 20, 2014 3:22 PM
To: Layton Willoughby, Kristen
Cc: Mike Wiczorek (mwiczorek@environcorp.com); Templin, Mike; Hussain, Munim; Rindom, Dave
Subject: Comments to Draft Permit 029-32119-00005

Dear Ms. Willoughby,

I have attached a letter with my comments regarding Draft Permit 029-32119-00005 for the MGPI of Indiana, LLC facility. I have also mailed a hard copy for your review.

If there are any questions regarding my comments, I can be reached using the contact information below.

Thank you for your consideration.

Randy Graves
EHS Manager
MGPI of Indiana, LLC
7 Ridge Avenue
Lawrenceburg, IN 47025
Phone (812) 532-4158
Fax (812) 532-4216
Email: randy.graves@mgpingredients.com

From: Graves, Randy [Randy.Graves@mgpingredients.com]
Sent: 3/27/2014 7:54:49 PM
To: Freeman, Teresa (TFREEMAN@idem.IN.gov) [TFREEMAN@idem.IN.gov]
CC: Mike Wieczorek [mwieczorek@environcorp.com]; Vinoski, James [James.Vinoski@mgpingredients.com]; Ponatoski, Becky [Becky.Ponatoski@mgpingredients.com]; Rindom, Dave [Dave.Rindom@mgpingredients.com]; Hussain, Munim [Munim.Hussain@mgpingredients.com]
Subject: Applicant Review of MGPI draft Part 70 Renewal 029-32119-00005
Attachments: Part_70_draft_permit_cover_letter_032714.docx; 32119per - comments.doc; Copy of 32119ca - comments.xls; 32119TSD - comments.doc

Ms. Freeman,

The attachments contain our review and comments regarding the renewal of the Part 70 air permit (T029-32119-00005) for the MGPI of Indiana, LLC plant.

Thank you for extending the deadline to review and supply these comments. MGPI of Indiana, LLC appreciates this opportunity to review the draft permit. We also request the opportunity to review a final draft after our comments have been addressed, prior to the start of the permit's public comment period. If you have any questions regarding our comments or would like to discuss them further, please don't hesitate to contact me at (812) 532-4158.

Respectfully submitted,

Randy Graves
EHS Manager
MGPI of Indiana, LLC
7 Ridge Avenue
Lawrenceburg, IN 47025
Phone (812) 532-4158
Fax (812) 532-4216
Email: randy.graves@mgpingredients.com

From: Freeman, Teresa [TFREEMAN@idem.IN.gov]
Sent: 4/9/2014 8:12:35 PM
To: Graves, Randy [Randy.Graves@mgpingredients.com]
CC: Mike Wieczorek [mwieczorek@environcorp.com]; Vinoski, James [James.Vinoski@mgpingredients.com]; Ponatoski, Becky [Becky.Ponatoski@mgpingredients.com]; Rindom, Dave [Dave.Rindom@mgpingredients.com]; Hussain, Munim [Munim.Hussain@mgpingredients.com]
Subject: RE: Applicant Review of MGPI draft Part 70 Renewal 029-32119-00005

Mr. Graves,

I wanted to touch base with you before sending the permit through to PN.

When the original TV for Seagrams was written, there were few ethanol based facilities in Indiana. Many of the factors used in the original permit were accepted and some had emission factors taken from other sources both in Indiana and other states. We have progressed in that time and with the changing regulations and additional parameters such as GHG, we have strived to do a better job of getting accurate emissions for our industries and companies in Indiana. More information is available to us. With the testing and writing of numerous ethanol facilities, we have a better understanding of the processes.

The consultant numerous times referred to us using ethanol facilities emission factors to get more accurate numbers for HAPs. The quantified number of 0.946 was not reflective of any facility similar to this. We will be glad to change the HAP calculations, if you have numbers from testing of similar facilities to MGPI. For now the permit is at least more reflective of HAPS than a low quantified number. You have always been a major source of HAPs and the more accurate numbers do not pose any new regulations.

I did not change the grain process calculations. Although there are emission factors for the grain processes, they are for controlled processes and we have then back calculated to find uncontrolled. We have found that using grain loading and air flow give a more accurate account of emissions and then back calculating for uncontrolled (although at times higher) are more accurate.

Because you have 30 days during PN to review and comment on the permit, there will be no additional review to this permit.

Also during and after PN, your contact will be Kristen Layton Willoughby. Her number is 317-233-3031 and e-mail is KWilloug@idem.IN.gov. This is effective on April 18, 2014.

Thank you

Teresa L. Freeman
Permits Branch
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana, 46204-2251
317-234-1243 (phone)
317-232-6749 (fax)

tfreeman@idem.in.gov

From: Graves, Randy [mailto:Randy.Graves@mgpingredients.com]

Sent: Thursday, March 27, 2014 3:55 PM

To: Freeman, Teresa

Cc: Mike Wiczorek (mwiczorek@environcorp.com); Vinoski, James; Ponatoski, Becky; Rindom, Dave; Hussain, Munim

Subject: Applicant Review of MGPI draft Part 70 Renewal 029-32119-00005

Ms. Freeman,

The attachments contain our review and comments regarding the renewal of the Part 70 air permit (T029-32119-00005) for the MGPI of Indiana, LLC plant.

Thank you for extending the deadline to review and supply these comments. MGPI of Indiana, LLC appreciates this opportunity to review the draft permit. We also request the opportunity to review a final draft after our comments have been addressed, prior to the start of the permit's public comment period. If you have any questions regarding our comments or would like to discuss them further, please don't hesitate to contact me at (812) 532-4158.

Respectfully submitted,

Randy Graves

EHS Manager

MGPI of Indiana, LLC

7 Ridge Avenue

Lawrenceburg, IN 47025

Phone (812) 532-4158

Fax (812) 532-4216

Email: randy.graves@mgpingredients.com

Hussain, Munim

From: Hussain, Munim
Sent: Wednesday, December 10, 2014 3:24 PM
To: jlacker@idem.in.gov
Subject: Draft materials for IDEM pre-application meeting
Attachments: MGP IDEM mtg agenda 20141211.doc; MGPI Permit app Figures_Draft.pdf; MGPI emission estimates_draft.pdf

Good Afternoon Jenny,

I left a voice message for you earlier in this afternoon regarding tomorrow's pre-application conference call. Attached are the meeting agenda, emission calculation and drawings for your review.

Mike Wiczorek from Environ and Gordon Working, Corporate Director of Engineering, MGP Ingredients, Inc., will be joining us in the conference call tomorrow at 2 pm (Indiana Time). Let me know if you have any questions.

Regards,

Munim Hussain

Corporate Environmental Engineer



MGP Ingredients, Inc.
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